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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

THE STATE OF CALIFORNIA;  
GAVIN C. NEWSOM, in his Official  
Capacity as Governor of California;  
KAREN ROSS, in her Official Capacity  
as Secretary of the California  
Department of Food & Agriculture;  
ERICA PAN, in her Official Capacity as  
Director of the California Department of  
Public Health; and ROB BONTA, in his  
Official Capacity as Attorney General of  
California,  
  
Defendants.

Case No. 2:25-cv-06230-MCS-AGR

**NOTICE OF MOTION AND  
UNOPPOSED MOTION TO  
INTERVENE**

The Honorable Mark C. Scarsi

Date: August 25, 2025  
Time: 9:00 a.m.  
Location: First Street Courthouse, 350  
W. 1st Street, Courtroom 7C, 7<sup>th</sup>  
Floor, Los Angeles, California 90012  
Trial Date: None  
Action Filed: July 9, 2025

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD,**

2 **PLEASE TAKE NOTICE** that at 9:00 a.m. on August 25, 2025, or as soon  
3 as the Court desires to hear this matter, in Courtroom 7C of the First Street  
4 Courthouse, 350 W. 1st Street, 7th Floor, Los Angeles, California 90012, Proposed  
5 Defendant-Intervenors Humane World for Animals, Animal Legal Defense Fund,  
6 Animal Equality, The Humane League, Farm Sanctuary, Compassion in World  
7 Farming, Inc., and Animal Outlook (collectively “Proposed Defendant-  
8 Intervenors”) hereby move this Court to allow their intervention in the above  
9 entitled action under Rule 24 of the Federal Rules of Civil Procedure.

10 Proposed Defendant-Intervenors are nonprofit organizations that crafted,  
11 sponsored, supported, and were instrumental in helping pass the laws challenged by  
12 Plaintiff and are dedicated to preventing farm animal cruelty, and to upholding and  
13 protecting Proposition 12 and AB 1437. Proposed Defendant-Intervenors have also  
14 been granted intervention status in several other cases challenging these exact same  
15 laws. Proposed Defendant-Intervenors seek to intervene as defendant-intervenors  
16 and to submit the Proposed Answer (Ex. 1). In the interest of judicial economy,  
17 Proposed Defendant-Intervenors propose that they be subject to the same briefing  
18 schedule as the state Defendants in this case, with respect to any dispositive  
19 motions that may be filed.

20 Proposed Defendant-Intervenors are entitled to intervention as of right  
21 pursuant to Rule 24(a) of the Federal Rules of Civil Procedure because (1) their  
22 application to intervene is timely, (2) they have interests relating to the subject  
23 matter of this action, (3) they are so situated that the disposition of this action may,  
24 as a practical matter, impede their ability to protect their interests, and (4) their  
25 interests are not adequately represented by the Defendants.

26 Alternatively, Proposed Defendant-Intervenors are entitled to permissive  
27 intervention pursuant to Rule 24(b) of the Federal Rules of Civil Procedure because  
28 (1) this Court has an independent ground for jurisdiction over Proposed Defendant-

1 Intervenor's defenses based on the federal questions raised in the Plaintiff's  
2 complaint, (2) this application to intervene is timely, (3) the defenses Proposed  
3 Defendant-Intervenors seek to assert have questions of law or fact in common with  
4 the present action, and (4) allowing Proposed Defendant-Intervenors to intervene at  
5 this early stage of proceedings will not unduly delay or prejudice this Court's  
6 adjudication of the original parties' rights, especially since they propose to be  
7 subject to the same briefing schedule as Defendants.

8 Defendants have indicated that they do not oppose Defendant-Intervenors'  
9 motion to intervene. In response to Proposed Defendant-Intervenors' inquiry,  
10 counsel for Plaintiff indicated that Plaintiff takes no position on this motion.

11 This Motion is based on this Notice of Motion and Motion, the supporting  
12 Memorandum of Points and Authorities, supporting declarations with attachments,  
13 all pleadings, records and papers filed in this action, such matters as the Court may  
14 judicially notice, and such further evidence or argument as may be presented at or  
15 before the hearing of this motion.

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18  
19 Dated: July 28, 2025

RILEY SAFER HOLMES & CANCELILA  
LLP

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22 By: /s/ Bruce A. Wagman  
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23  
24 *Counsel for Proposed Defendant-*  
*Intervenors*